

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

CASE NO. 22-20552-CR-Damian/Valle

Plaintiff,

v.

DAVID RIVERA,

Defendants.

//

**DAVID RIVERA’S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL
TO MILWAUKEE, WISCONSIN**

Defendant, David Rivera (“Mr. Rivera”), through counsel¹, respectfully moves this Honorable Court for permission to travel to Milwaukee, Wisconsin for business purposes and states:

1. Pursuant to his conditions of pretrial release, Mr. Rivera’s travel is restricted to the Northern District of Georgia, the Middle and Southern Districts of Florida and the Southern District of New York. The geographic restrictions on travel can be modified if, “the supervising officer has approved travel in advance.” ([DE-24] at p 6, par. q). However, his travel is further restricted to court appearances and meetings with counsel ([DE-24] at p 6, par. r).

2. Mr. Rivera seeks to travel to Milwaukee, Wisconsin for the Republican National Convention on Sunday, July 14th until Friday, July 19th, 2024.

¹ The filing of this motion is not intended as a permanent appearance by the undersigned counsel who have heretofore appeared only temporarily as counsel for Rivera. *See* Dkt. 37 and Local Rule 11.1(d)(1).

3. Defendant Rivera was recently elected as a Delegate to the Republican National Convention being held from July 15th to 18th in Milwaukee, Wisconsin, whereby former President Donald Trump will be selected as the Republican nominee for President of the United States.²

4. Rivera is also an elected official in Miami-Dade County who is seeking re-election in this year's election.

5. Mr. Rivera's pretrial officer, Alexander Moody, does not oppose the relief sought in this motion.

6. Once this request for travel has been approved by the Court, Mr. Rivera will provide the specific flight and hotel details to his Pretrial Services officer, as well as the government, in advance of his travel.

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 88.9(a), undersigned counsel certifies that he has conferred with AUSA Harold Schimkat who **does not oppose** the relief sought in this motion.

² Exhibit 1 _ Email to 2024 RNC Convention Delegates, dated May 5, 2024.

WHEREFORE, Rivera moves the Court for an order permitting him to travel to Milwaukee, Wisconsin from July 14, 2024 through July 19, 2024.

Respectfully submitted,

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for Defendant Rivera

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 17th day of June, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served this day on all counsel of record either via transmission of Notices of Electronic Filing generated by CM/ECF or in another authorized manner for those counsel or parties not authorized to receive electronically Notices of Electronic Filing.

/s/ Edward R. Shohat
Edward R. Shohat